

11 RF 4134

# EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.  
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July 16, 1991

91-RF-4134

R.M. Nelson, Jr.  
Manager  
DOE, RFO

Attn: J. Wienand

## SOLAR EVAPORATION PONDS - LAND DISPOSAL RESTRICTIONS WITH RESPECT TO THE INTERCEPTOR TRENCH SYSTEM - JMK-0315-91

The solar evaporation ponds have an Underground Interceptor Trench System (ITS) that is designed to return pond leakage and run-off back to the ponds. It is our understanding that the enclosed letter (90-DOE-11185) was sent to the Environmental Protection Agency (EPA) to address EPA's concern that the return of untreated ITS water to the ponds is a potential violation of the RCRA Land Disposal Restrictions (LDR). The purpose of this letter is to inform you of the following actions we have taken to address this issue:

- We reviewed sampling data from the solar evaporation ponds and the ITS. There have been times when the maximum levels of some constituents in the water have exceeded the levels that the LDR regulations allow for land disposal. Currently, the only water management option available is to continue returning the ITS water to the solar evaporation ponds. To do otherwise could result in discharge to surface waters. In order to comply with the LDR regulations, a new system needs to be installed to collect and treat the ITS water. Actions have been initiated to do so.
- As you know, a proposed plan to better manage the ITS water was presented to the Colorado Department of Health (CDH) and EPA in a meeting on December 14, 1990. The plan is to install surge tanks and portable evaporators to contain and treat the french drain water. Work on the design and installation of the tanks and evaporators is underway and has high priority. Following CDH guidance on December 7, 1990, a request for change to interim status to allow operation of the portable evaporators was submitted to CDH on December 21, 1990. Subsequent to that request, CDH changed their position in a letter dated June 24, 1991, which stated that the "change to interim status" approach is not appropriate and the "interim measure/interim remedial action (IM/IRA)" process should be used to permit the operation of the portable evaporators and surge tanks. EG&G letter dated June 28, 1991, provided you with a draft IM/IRA document to initiate obtaining

DIST.	LTR	ENG
ETZKE, J.C.		
RLINGAME, A.H.		
PP, R.D.		
OUCHER, D.W.		
VIS, J.G.		
ERED, J.E.	X	X
REERA, D.W.		
TRIS, L.R.		
NIKOR, F.J.		
ANCIS, G.E.	X	X
ODWIN, R.		
ALY, T.J.		
KER, F.H.		
JS, J.P.		
LE, P.B.		
ASH, J.M.		
BY, W.A.		
KEBO, J.A.		
E.M.	X	X
JESTIC, J.B.		
THEWS, T.A.		
URRENS, B.E.		
RGAN, R.V.	X	X
RTH, P.		
MER, L.A.		
ITER, G.L.	X	X
ZUTO, V.M.		
OADES, J.I.	X	X
FEEL, B.E.		
ANSON, E.R.		
BE, J.S.		
KINSON, R.B.		
LIAMS, R. E.		
SON, J. M.		
UNG, E.R.		
VE, J. O.	X	X
ubert AL	X	X
rich PW	X	X
knor KW	X	X
zhkc CD	X	X
rich BA	X	X
ichian JA	X	X
hanson ML	X	X
g RT	X	X
berts JD	X	X
rter DG	X	X
uma RS	X	X
derson SA	X	X
ith SR	X	X
-WM	X	X
PHRES CONTROL	X	X
AFFIC	X	X
old PM	X	X
engand TC	X	X
CLASSIFICATION:		
CNI		
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

THORIZED CLASSIFIER  
SIGNATURE

10/19/91

REPLY TO LTR NO.

none

APPROVALS

RIG & TYPIST INITIALS

IT-AAFekner

46469 (Rev. 3/91)

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ADMINISTRATIVE


4-0004-000036

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91-RF-4134  
Page 2 of 2

CDH and EPA approval for the portable evaporators and temporary surge tanks. Approval of the portable evaporators and surge tanks is dependent upon public comments and therefore a completion date for installation is not known at this time.

- c. In the interim, we will incorporate installation of the surge tanks and portable evaporators into the new LDR Compliance Plan as a compensatory measure while we bring the ITS water into compliance.

Activities noted in paragraphs b. and c. above will proceed in an expeditious manner in order to bring the ITS water into compliance as soon as possible. If you have any questions or require additional information, please contact Allen Schubert at extension 5251 or Kirk Ticknor at extension 6344.



J.M. Kersh, Associate General Manager  
Environmental and Waste Management  
EG&G Rocky Flats, Inc.

KWT:kam

Orig. and 1 cc: - R.M. Nelson, Jr.

Enclosure:  
As Stated